

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD TYLER HUNSINGER,
Defendant.

CRIMINAL ACTION NO.:
1:20-CR-00466-AT-AJB

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, Counsel for Defendant RICHARD HUNSINGER and hereby Moves this Court to modify the conditions of pretrial release. In support of his Motion, Defendant shows as follows:

On or about December 21, 2020, this Honorable Court set conditions of pretrial release for Mr. Hunsinger. (Doc. 32). Pertinent to this motion, the Court set the following conditions:

- Electronic location monitoring (*Id.* at ¶ 4), and
- Home detention with listed exceptions (*Id.* at 3 & 5).

The Court invited Mr. Hunsinger, “after four months of home detention”, to seek modification. (*Id.* at ¶ 17). Mr. Hunsinger has been meticulously compliant during pretrial release. Now, nine months after his release, Mr. Hunsinger seeks to

modify the conditions of release to remove the requirement for location monitoring, remove the condition of home confinement, and establish a curfew which will require him to be home from 10p.m. to 6 a.m. The curfew may be modified for work and other under circumstances as approved by the supervising probation officer; the probation officer shall have permission to exercise discretion to modify the curfew without seeking approval from the Court.

Assistant United States Attorney Ryan Buchanan has been informed of this request as have the supervising probation officers in both the Northern District of Georgia and the Eastern District of Virginia where Mr. Hunsinger resides in his parents' home. No parties object to this request.

WHEREFORE, the Defendant prays that the Court sign an order authorizing the changes to the conditions of release as requested herein. Counsel will submit a proposed order in Word via the courtroom deputy.

Dated: This 24th day of September, 2021.

Respectfully Submitted,
/s/ John Lovell
Attorney for Defendant
Georgia Bar No. 359390
John Lovell, Esq., P.C.
90F Glenda Trace, #427
Newnan, Georgia 30265
404.981.7847/john@johnrlovell.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1C, and I have this day electronically filed the document with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorney(s) of record in the case, including opposing counsel.

Dated: This 24th day of September, 2021.

s/John Lovell

John Lovell

JOHN LOVELL
Georgia State Bar No. 359390
John Lovell, Esq., P.C.
90F Glenda Trace, #427
Newnan, Georgia 30265
404.981.7847
john@johnrlovell.com